

*Attachment I,*

*Defense Motion of July 25, 2016*

STATE OF RHODE ISLAND  
SUPREME COURT

*CITING FEDERAL ACTION*

ANNE ARMSTRONG and  
ALAN GORDON

SU-2016-187  
(KC-16-0599)

v.

STATE OF RHODE ISLAND et al.

**DEPARTMENT OF ATTORNEY GENERAL AND STATE OF  
RHODE ISLAND'S MOTION FOR EXTENSION OF TIME TO FILE THEIR  
RESPONSE TO APPELLANTS' PETITION FOR A WRIT OF CERTIORARI**

NOW COME, Appellees, the Department of Attorney General and the State of Rhode Island, (hereinafter, the "State"), pursuant to the Rules of Appellate Procedure, and hereby move for an Order of this Honorable Court enlarging the period of time to file their Response to Appellants' Petition for a Writ of Certiorari in the above-captioned case for an additional thirty (30) days, to August 25, 2016. As grounds for its motion, the State asserts that the legal issues presented in this appeal are complex thus requiring additional time. Also, Petitioners have also filed a similar case in federal court with extensive documents that the State wishes to have time to review.

WHEREFORE, the State respectfully requests an Order granting its Motion for Extension of Time and allowing an additional thirty (30) days, up to and including August 25, 2016, in which to file its Response.

Respectfully submitted,  
Appellees,

THE STATE OF RHODE ISLAND AND  
PROVIDENCE PLANTATIONS and  
DEPARTMENT OF THE ATTORNEY  
GENERAL,

By their Attorney,

PETER F. KILMARTIN  
ATTORNEY GENERAL

*Michael Resnick*

*S. E. Urso*

---

Susan E. Urso, #4688  
Assistant Attorney General  
Michael D. Resnick, #9028  
Special Assistant Attorney General  
150 South Main Street  
Providence, Rhode Island 02903  
(401) 274-4400 exts. 2233/2301  
(401) 222-2995 (fax)

**CERTIFICATION**

I hereby certify that on this 25<sup>th</sup> day of July, 2016 a true copy of the within Motion was mailed, first class, postage prepaid to:

Anne Armstrong  
99 Hudson Pond Road  
West Greenwich, RI, 02817

Anne Armstrong  
Department of Corrections  
Women's Facility  
PO Box 8312  
Cranston, RI 02920

Alan Gordon  
99 Hudson Pond Road  
West Greenwich, RI, 02817

Alan Gordon  
Intake Service Center  
PO Box 8249  
Cranston, RI 02920

*Nelisa F. D'Amico*